## LEE LITIGATION GROUP, PLLC

148 WEST 24TH STREET, EIGHTH FLOOR NEW YORK, NY 10011 TEL: 212-465-1180 FAX: 212-465-1181 INFO@LEELITIGATION.COM

WRITER'S DIRECT: (212) 465-1188

cklee@leelitigation.com

June 15, 2021

## Via ECF

The Honorable Paul G. Gardephe, U.S.D.J. United States District Court Southern District of New York 40 Foley Square, Room 2204 New York, NY 10007

Re: Thompson et al. v. Elev8 Foundation, Inc. et al.

Case No.: 20-cv-00970

Dear Judge Gardephe:

I am counsel to Plaintiffs on this matter. Pursuant to Your Memo Endorsement of May 19, 2021 (Dkt. No. 37), we write to request an extension of the deadline to submit Plaintiffs' Opposition to Defendants' Motion to Dismiss Plaintiffs' First Amended Complaint.

Plaintiffs request a two (2) week extension of the original date of June 18, 2021, to submit their Opposition. This is Plaintiffs' first request for an extension. Due to the recent reopening of our firm from the pandemic and the on-boarding of new associates, an extension is necessary for them to familiarize themselves with the case file. Counsel for Defendants has consented to Plaintiffs' request for an extension.

Plaintiffs submit the proposed briefing schedule below, in light of their request:

Plaintiffs' Opposition to Defendants' Motion July 2, 2021 to Dismiss Plaintiffs' First Amended

Complaint, if any

Defendants' Reply in Support of Defendants' July 16, 2021

Motion to Dismiss, if any

We thank the Court for its patience and understanding.

Respectfully,

/s/ C.K. Lee C.K. Lee, Esq.

cc: all parties via ECF